

5 9 0444

APPENDIX H
STATE CONCURRENCE LETTER



PROMOTE PROTECT PROSPER

2600 Bull Street
Columbia, SC 29201-1708

September 29, 2003

COMMISSIONER:
C. Earl Hunter

BOARD:
Bradford W. Wyche
Chairman

Mark B. Kent
Vice Chairman

Howard L. Brilliant, MD
Secretary

Carl L. Brazell

Louisiana W. Wright

L. Michael Blackmon

Larry R. Chewning, Jr., DMD

Jimmy Palmer
Regional Administrator
U.S. EPA, Region IV
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303

Re : Aqua-Tech Environmental Site
Greer, South Carolina
Final Record of Decision

Dear Mr. Palmer :

The Department has reviewed and concurs with all parts of the Record of Decision (ROD) dated September 2003 for the Aqua-Tech Environmental Site located in Greer, South Carolina. In concurring with this ROD, the South Carolina Department of Health and Environmental Control (SCDHEC) does not waive any right or authority it may have under federal or state law. SCDHEC reserves any right or authority it may have to require corrective action in accordance with the South Carolina Pollution Control Act. These rights include, but are not limited to, the right to insure that all necessary permits are obtained, all clean-up goals and remedial criteria are met, and to take separate action in the event clean-up goals and remedial criteria are not met. Nothing in the concurrence shall preclude SCDHEC from exercising any additional administrative, legal and equitable remedies available to require additional response actions in the event that : (1)(a) previously unknown or undetected conditions arise at the site or (b) SCDHEC receives information not previously available concerning the premises upon which SCDHEC relied in concurring with the selected alternative; and (2) the implementation of the remedial alternative selected in the ROD is no longer protective human health or the environment.

The Department concurs with the selected alternative for soils comprised of 1) Construction of a RCRA Subtitle C cap in the Process Distillation Area; 2) Construction of a RCRA Subtitle D soil cover over the landfill limits; and 3) In situ soil treatment in the form of Soil Vapor Extraction (SVE) in and around the Process Distillation Area. It is the Department's understanding that the SVE will be used to reduce contaminant mass in and around the Process Distillation Area and those soils may or may not be incorporated into the cap design. The combined caps will

5
0445
waste
@ Palmer

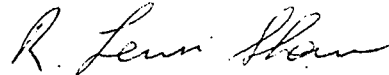
U.S. EPA REGION 4
OFFICE OF
REGIONAL ADMINISTRATOR
2003 OCT - 2 PD

involve the handling of approximately 66,000 cubic yards of soil with the final limits of the caps being confirmed in the Remedial Design.

~~The Department concurs with the~~ selected alternative of *In situ Chemical Treatment* for contaminated groundwater at the site. It is our understanding that in situ chemical injection will be utilized to stimulate degradation of chlorinated solvent contaminants found in the groundwater of the site. The specific chemical oxidant or reductant to be used at the site will be selected based on treatability testing conducted during the Remedial Design. Treatment will begin in upgradient areas of the contaminant plume, with downgradient areas being monitored for potential impact and future treatment options. In addition, treatment will also begin in the saprolite zone of the aquifer, with monitoring of the bedrock zone. The decision to ~~initiate treatment~~ of downgradient and bedrock areas of the plume will be made by EPA and the Department based on initial treatment performance data.

If you should have any questions regarding the Department's concurrence with the ROD, please contact Scott Wilson at (803) 896-4077.

Sincerely,



R. Lewis Shaw
Deputy Commissioner
Environmental Quality Control

cc : Hartsill Truesdale, BLWM
Keith Lindler, BLWM
Richard Haynes, BLWM
Scott Wilson, BLWM
Kent Coleman, BLWM
Rick Richter, Trident EQC
52233; file